

Arthur J. Holzknecht  
148 Raymond Ave.  
Barrington, IL 60010

Surface Transportation Board  
CN-EJ&E EIS - FD-35087  
Log and Distribution  
Date Recd: \_\_\_\_\_  
HDR File No: \_\_\_\_\_

Email: [arth@ameritech.net](mailto:arth@ameritech.net)  
Tel: 847.382.8987

January 25, 2008

Surface Transportation Board  
395 E Street, SW  
Washington DC 20423  
Attn: Phillis Johnson-Ball

Scanned (Initial): \_\_\_\_\_  
STAECT#: \_\_\_\_\_  
Cc: Original - J. B. file  
\_\_\_\_\_  
\_\_\_\_\_

**RE: Comments on Draft Scope of Work for the Draft Environmental Impact Statement for the Proposed Canadian National Railway Company Acquisition of the Elgin, Joliet and Eastern Railway**

**STB Finance Docket No. 35087**

Dear Ms. Johnson-Ball;

I am writing in response to the proposed scope of the Environmental Impact Study (EIS) relating to the potential acquisition of the EJ&E railroad by Canadian National Railway (CN). There are many detrimental environmental impacts associated with this acquisition due to the vast increase in the number and length of freight trains that will utilize the EJ&E tracks. These impacts must be given thorough consideration before rendering a decision.

It is my opinion that the adverse consequences of this acquisition far outweigh any regional economic benefit. I believe the EIS will bear this out. For this primary reason, this acquisition should be denied on the basis that it does not serve the public interest. If, however, the STB rules in favor of the acquisition, it is absolutely necessary that appropriate substantive mitigation measures must be undertaken **and completed before** there is any increase in freight traffic.

The EJ&E rail line runs through the center of the village of Barrington. This purchase and the subsequent dramatic increase in freight rail traffic through the area will have major detrimental impacts on our community in the following ways:

1. Unsustainable increases in vehicle traffic congestion, in a region already struggling with rush hour gridlock and population growth. There are eight street-grade level EJ&E crossings on roads that serve the Barrington communities. All crossings through the village and immediate environs must be made grade separated. To reduce noise and vibration, and to help contain environmental damage due to pollution and derailment, all grade separated crossings must put the railroad tracks *below road grade*.

2. The safety of our children will be put at risk, many of whom must cross grade level crossings to get to school, either on foot or by bus. Our children will also have to deal with increased traffic on secondary roads as frustrated drivers try to get around the gridlock. In particular, the EIS should consider the crossing at Lake-Cook Road in reference to access to Barrington High School (BHS).
  - 2.1. BHS has many extracurricular programs. Hence, the number of hours that the crossing is heavily utilized by students going to and from school extends well before and after the normal school day. Nighttime crossings present a particular hazard.
  - 2.2. BHS hosts many sports programs and cultural events. These occur on evenings and weekends.
  - 2.3. Teenagers can be expected to engage in risky behavior to cross the tracks to avoid being late for school and school events.
  - 2.4. A local fast food hang-out, "Tracks", is very popular with teenagers. This is located immediately adjacent to the tracks at the intersection of Lake-Cook Rd and Lageschulte Rd. Teenagers continuously cross the tracks to get to and from this popular spot.
  - 2.5. The EIS should also consider the neighborhood immediately west of the Lake-Cook Road crossing (Raymond, Hager, and Lake Cook Roads, known as Walnut Grove subdivision). Children in this neighborhood must cross the tracks to go to Hough Street Elementary School. They must also cross at Lake Cook to attend both middle schools that serve the area.
3. There is a bike path connecting Langendorf Park, BHS, and the community sports fields (behind BHS). This bike path is accessed by crossing the EJ&E tracks at Lake Cook Road and then traveling along Raymond Ave. This access will become quite dangerous for children cycling. (Note: Barrington constructed a grade separated underpass for the bike path at the Metra UPNW tracks to eliminate the danger to cyclists having to cross the Metra tracks to access Langendorf Park. This acquisition will create a far more dangerous RR crossing for our children.)
  - 3.1. Barrington is proposing to construct a new \$24 million fitness and community recreation center at Langendorf Park. This will increase the number of bicycles going to the park.
  - 3.2. The Barrington Aquatic Center is located in Langendorf park. This center is very popular with children and families, many of whom ride bicycles to the park along the bike path in the summer months.
  - 3.3. The community sports fields are extremely popular. Sporting events occur throughout the day and evening. Weekends in particular are very busy, but weeknight events are also well attended. Pedestrians and cyclists use the bike path for access.
4. The community sports fields behind BHS along NW Highway (Rte 14) are accessed by vehicles via Hart road, requiring a crossing of the EJ&E tracks at Lake Cook Road. There are numerous little league and other youth sports activities that require participants and spectators to cross the tracks to attend. Also, the noise from freight trains and associated pollution should be evaluated for its effect on the safety of those utilizing the sports fields.
5. Emergency and public safety responsiveness will be compromised due to blocked crossings and traffic gridlock.

- 5.1. First responders will be blocked from accessing the Walnut Grove subdivision if the crossing at Lake Cook Road is blocked. This is particularly dangerous if there were a derailment with release of hazardous chemicals or cargo.
  - 5.2. Barrington public works facility is located at the end of Raymond Ave. Emergency vehicles and salt trucks use this depot. The ability to respond to icy road conditions will be impacted.
    - 5.2.1. During recent flooding, the public works facility was the control center for flood response. Community volunteers filled sandbags at the facility. Residents could pick up sandbags. Village employees deployed sandbags at critical locations. This quick response required easy access to the facility, since the actions continued late into the night. If the crossing was blocked, there would have been far more property damage due to the inability to gain access.
  - 5.3. There is a Com Ed substation at the end of Laverne Ave. Emergency repair trucks are dispatched from this site.
  6. Environmental pollution will increase dramatically from the thousands of cars that will be idling while waiting for trains to clear the crossings. Also, the trains themselves will emit substantial amounts of particulate pollutants.
    - 6.1. In particular, the effects of airborne pollutants, train noise, and vibrations should be specifically investigated for the neighborhood immediately west of the EJ&E crossing at Lake-Cook Road, including **all residences** on Raymond Ave, Hagar Ave, Laverne Ave, and Lake-Cook Road to BHS (sometimes referred to as Walnut Grove subdivision).
    - 6.2. Incidences of asthma and other respiratory ailments should be analyzed as a function of proximity to the tracks and crossing vs. number and frequency of trains and vehicle delays. This should be particularly analyzed for the Walnut Grove subdivision.
  7. Noise pollution from trains and their horns will be a major environmental disturbance, with a substantial detrimental impact to quality of life and psychological well being.
  8. Regional economic activity will be adversely impacted as businesses will avoid the area due to the congestion and noise. Local businesses will suffer. The economic viability of the entire downtown Barrington area is seriously threatened. Much of Barrington's revenues come from sales taxes. Significant investments have recently been made to support and expand local retail development. The loss of sales tax revenue and the specter of vacant storefronts will cripple Barrington.
    - 8.1. A newly constructed shopping center along Rte 59 just north of the EJ&E crossing, Flint Creek Crossing, is just starting to attract tenants. The viability of this investment will be substantially impacted.
    - 8.2. Cook Street Plaza, a downtown Barrington residential and retail development, is also recently completed and still not fully populated. The idea behind this development is to promote in-town living to support a livable downtown. This investment will suffer.
    - 8.3. Barrington village is redeveloping the property at the intersection of Lake Cook Roads and Rte 59. This development will also combine in-town residential and retail. Again, this investment is seriously threatened.
- All the hard work that Barrington has done and is doing to enhance the downtown and attract residents and visitors for shopping will be undone by this ill-conceived acquisition.

9. Property values will suffer as prospective home buyers avoid the area. Road congestion, pollution, noise, and danger of derailment will diminish the desirability of Barrington as a place to live and raise a family.
  - 9.1. Impacts to the property tax base and the associated ability to fund schools and other critical public services should be thoroughly investigated. Necessary mitigation measures must be considered that would restore property values to their historical norms.
  - 9.2. Residential development that has occurred in the vicinity of the EJ&E tracks over the past five or more decades has factored in the historical rates of freight train traffic. Reasonable accommodation was achieved considering the typical traffic. It is unreasonable to now change the balance so far in favor of rail commerce at the expense of the residents. People who chose to live in Barrington had a very reasonable expectation of moderate freight traffic on the EJ&E line. Many decades of experience demonstrated this. If there was far more train traffic development patterns would have been completely different. The established pattern of development is unsuited to 20 or more trains per day.
10. The EJ&E passes through pristine nature preserves, beautiful public spaces, and the Flint Creek watershed. The adverse impact to the natural environment must be thoroughly analyzed.
  - 10.1. The EJ&E traverses the newly opened "Citizen's Park". This park was a major investment to provide a place for recreation, peace and tranquility for Barrington. How can people enjoy the natural setting with constant train traffic? There is a newly constructed outdoor performance pavilion in the park, very close to the tracks. Storytelling, performances, and concerts will be constantly interrupted by train noise, rendering this beautiful facility useless.
  - 10.2. The EJ&E bisects the Cuba Marsh nature preserve. This spectacular pristine prairie and wetland habitat will be irreparably damaged by so much train traffic. The Cuba Marsh ecosystem is home to unique, rare, threatened, and perhaps endangered, flora and fauna. A thorough census of the ecosystem is essential, and an analysis of the potential impact of so many trains to the viability of critical habitat must be undertaken.
  - 10.3. The EJ&E travels perilously close to Flint Creek. The Flint Creek watershed has been undergoing a major rehabilitation, with reduction in pollution and replacement of invasive species with native ones. The restoration of this critical watershed is severely threatened by so many trains and the associated dramatic increase in pollution from trains and runoff from so many idling cars.
11. The impact on regional mass transit must be considered.
  - 11.1. The proposed Metra STAR line would be eliminated by this acquisition. Regional impacts on traffic congestion, pollution, fuel consumption and economic development due to the elimination of the STAR line must be considered as part of the environmental impacts of this transaction.
  - 11.2. This transaction must be evaluated in the context of alternate solutions to the problem of freight rail congestion. Specifically, the CREATE program was developed as a public-private partnership to solve the freight congestion problem by holistically considering the impacts on all stakeholders to arrive at an optimal solution that is balanced in terms of cost-benefits. If alternate solutions can be found (via

CREATE or other methodologies) that have less impact than this transaction, then the alternate approach should be followed and this transaction must be rejected.

- 11.3. The EJ&E crosses the Metra UPNW tracks in Barrington at an unprotected grade level crossing. The UPNW is a critical commuter route to Chicago for Barrington and many people from the neighboring towns who commute to the Barrington train station. It is expected that trains would be added as population grows. The impact on commuter traffic is part of the environmental impact associated with this transaction. Also, an eventual connection of the STAR line to Barrington must be considered. The elimination of this eventuality is a detrimental impact. Regional scenarios for increases in traffic, pollution, and fuel consumption due to impacted mass transit must be considered.

For these reasons and more, I urge you to reject this acquisition. The interests of the established residents and businesses must be taken into full consideration. We were here first.

I also believe that CN has grossly understated the increase in freight traffic that they will pass through Barrington. CN's estimated 15 additional trains per day (already too many for the area to absorb) does not include:

- Container traffic from the recently opened Port of Prince Rupert terminal that will be routed through the area;
- Rail traffic from the other 4 large railroads that CN will admit to the EJ&E line;
- Projected freight rail traffic increases of 80% over the next 20 years in the Chicago area.

All this traffic would be added to a rail line currently carrying only 3-5 trains per day. The EIS must consider far reaching projections on increases in train traffic exceeding a 3-5 year time horizon. Scenario analysis must be undertaken to determine the effects on the local environment if there are even more trains than initially projected, as such outcomes are reasonably expected.

In consideration of the hugely negative consequences of this acquisition to the entire Barrington region, I respectfully and most strenuously urge you to reject this proposed acquisition. The drawbacks overwhelmingly outweigh the benefits.

Sincerely,



Arthur Holzknicht